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*Attorneys for Center for Employment Security  
Education and Research*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Tsang, Donna,

Plaintiff,

vs.

Experian Information Solutions, Inc.;  
JPMorgan Chase Bank, N.A.; Merrick Bank  
Corporation; MRS BP, LLC dba MRS  
Associates; Fair Square Financial Group, LLC  
dba Ollo Card Services; Premiere Bankcard,  
LLC; Colorado Department of Labor and  
Employment; The Ohio Department of Job and  
Family Services; Center for Employment  
Security Education and Research; Credit One  
Bank, N.A.; U.S. Small Business  
Administration Office of Disaster Assistance;  
and Equifax Information Services, LLC;

Defendant.

Case No. 2:22-cv-00572-GMN-BNW

**AMENDED STIPULATION AND  
ORDER TO DISMISS**

Plaintiff DONNA TSANG (“Plaintiff”) and Defendant CENTER FOR EMPLOYMENT  
SECURITY EDUCATION AND RESEARCH (“Defendant”), by and through their respective  
undersigned counsel of record, agree and stipulate to dismiss Plaintiff’s claims against

1 Defendant with prejudice.

2 The parties have fully resolved Plaintiff's claims against Defendant through a mutually  
3 agreeable settlement, and, as such, Defendant should be dismissed from this case. The parties  
4 are to bear their own fees and costs associated with this case.

5  
6 IT IS SO STIPULATED.

7 DATED this 15<sup>th</sup> day of July, 2022.

DATED this 15<sup>th</sup> day of July, 2022

8  
9 Freedom Law Firm

Lewis Brisbois Bisgaard & Smith LLP

10  
11 By: /s/ Gerardo Avalos

By: /s/ Marcus Lee

12 Gerardo Avalos  
13 Freedom Law Firm  
14 8985 S. Eastern Ave, Suite 350  
15 Las Vegas, NV 89123  
16 *Attorneys for Defendant*

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*Attorneys for Plaintiff*

17 **ORDER**

18  
19 **IT IS SO ORDERED.**

20 Dated this 15 day of July, 2022.

21  
22   
23 Gloria M. Navarro, District Judge  
24 UNITED STATES DISTRICT COURT  
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26  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 15<sup>th</sup> day of July, 2022, I electronically filed the  
**AMENDED STIPULATION AND ORDER TO DISMISS** with the Clerk of the Court  
through Case Management/Electronic Filing System.

By /s/ Krystle Platero  
An Employee of  
LEWIS BRISBOIS BISGAARD &  
SMITH LLP